

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 25cr10272
)	
v.)	Violations:
)	
KSENIIA PETROVA,)	<u>Count One</u> : Concealment of Material Fact
)	(18 U.S.C. § 1001(a)(1))
)	
Defendant)	<u>Count Two</u> : False Statement
)	(18 U.S.C. § 1001(a)(2))
)	
)	<u>Count Three</u> : Smuggling
)	(18 U.S.C. § 545)

INDICTMENT

At all times relevant to this Indictment:

General Allegations

1. Defendant KSENIIA PETROVA (“PETROVA”) was a citizen of the Russian Federation. PETROVA worked as a research assistant at a Boston-area medical school and was present in the United States working under the auspices of a J-1 visa, which is a non-immigrant visa issued by the U.S. State Department to foreign national participating in exchange visitor programs.

2. On or about February 16, 2025, PETROVA arrived at Logan International Airport in Boston, Massachusetts via an inbound flight from Paris, France, and was found to be carrying undeclared biological specimens, which were later identified as multiple clawed frog (*Xenopus tropicalis* and *Xenopus laevis*) embryos and embryonic samples in paraffin well stages and on mounted dyed slides.

COUNT ONE
Concealment of Material Fact
(18 U.S.C. § 1001(a)(1))

The Grand Jury further charges:

3. The Grand Jury re-alleges and incorporates by reference paragraphs 1-2 of this Indictment.

4. On or about February 16, 2025, at Boston, in the District of Massachusetts, the defendant,

KSENIYA PETROVA,

knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device, a material fact in a matter within the jurisdiction of the executive branch of the Government of the United States; that is, she imported and brought into the United States multiple fixed and embedded frog embryos, which are required to be declared pursuant to 19 C.F.R. § 148.11, without declaring such items to a Customs and Border Protection (“CBP”) Agent of the United States Department of Homeland Security.

All in violation of Title 18, United States Code, Section 1001(a)(1).

COUNT TWO
False Statement
(18 U.S.C. § 1001(a)(2))

The Grand Jury further charges:

5. The Grand Jury re-alleges and incorporates by reference paragraphs 1-2 of this Indictment.

6. On or about February 16, 2025, at Boston, in the District of Massachusetts, the defendant,

KSENIIA PETROVA,

knowingly and willfully made a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, when asked by a CBP Agricultural Specialist if she had any biological material in her possession, she stated no. This statement and representation was false because, as PETROVA then and there knew, she had multiple fixed and embedded frog embryos in her checked luggage and in a bag on her person.

All in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT THREE
Smuggling Goods into the United States
(18 U.S.C. § 545)

The Grand Jury further charges:

7. The Grand Jury re-alleges and incorporates by reference paragraphs 1-2 of this Indictment.

8. On or about February 16, 2025, in the District of Massachusetts, the defendant,

KSENIIA PETROVA,

fraudulently and knowingly imported and brought into the United States, merchandise, defined at 19 U.S.C. § 1401(c), as “goods, wares, and chattel of every description,” including multiple fixed and embedded frog embryos, contrary to law, specifically 19 C.F.R. § 148.11, which requires that “[a]ll articles brought into the United States by any individual must be declared to a CBP officer at the port of first arrival in the United States....”

All in violation of Title 18, United States Code, Section 545.

A TRUE BILL


FOREPERSON


NADINE PELLEGRINI
DAVD M. HOLCOMB
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

District of Massachusetts: June 25, 2025
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK